



CCW

The voice for water consumers
Llais defnyddwyr dŵr

Review of household customer complaint handling by water companies in England and Wales

1 April 2022 - 31 March 2023



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Introduction

CCW is the independent voice for water consumers in England and Wales.

We are here to help customers that have been unable to resolve a complaint against their water company, while providing free advice and support. Every year we help thousands of customers reach a satisfactory conclusion to their complaint, including securing financial redress or changes that lead to an improved service. All of our work is informed by extensive research, which we use to champion the interests of consumers and influence water companies, governments and regulators.

This report looks specifically at the experiences of household customers. It draws together the intelligence and insight we've been able to gather from the complaints made directly to water companies and those where customers have sought our help to get a resolution. We use this to establish where there might be specific issues at a company or industry level that are impacting customer service and need to be addressed. Through identifying the reasons behind customers' dissatisfaction, we are then able to work with companies to tackle these problems.

What we assess

We compare companies' performance using two main metrics. The first is the number of complaints received directly by water companies from their customers. We've improved how we collect this information, so that we now have a more complete picture of companies' performance. Our report now includes complaints across all channels including telephone, social media and those made in writing. Previously we had focused on written complaints, which did not tell the whole story.

Secondly, we assess how well complaints were handled. This takes into account complaints that could not be resolved to the customer's satisfaction by companies – known as escalated Stage 2 complaints - and those people bring to us for help resolving. Each metric allows us to compare the performance of individual companies and identify trends within the sector to bring about positive changes for customers. We explain our methodology further in Appendix 1a.

We separate companies when comparing their performance into two distinct groups, depending on the services they provide:

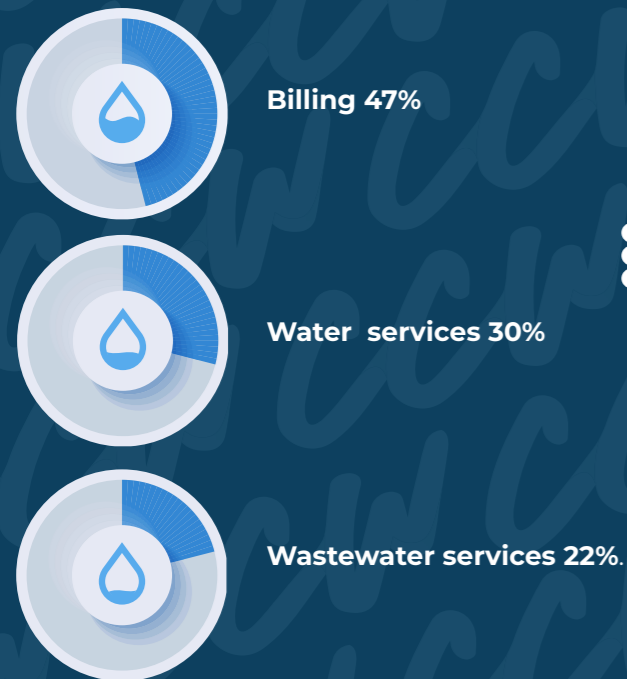
- Water and sewerage companies (WaSCs) provide both water and sewerage services to customers; and
- Water only companies (WOCs) only provide water services to customers.

Key findings

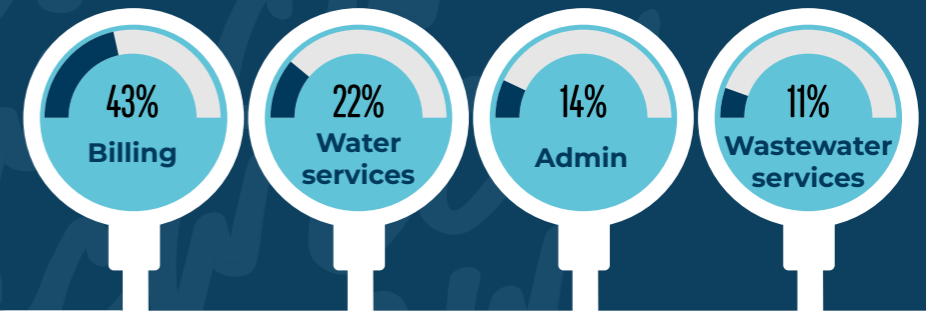
Total customer complaints to water companies

2022-23:
232,817

Main causes of complaints to water companies



Main causes of complaint to CCW



Total complaints to CCW

2022-23:
6,197 (+1%)
WASCs -3.7%
WOCs +66%

Comparatively better performers

- Wessex Water
- Hafren Dyfrdwy
- Bristol Water
- Portsmouth Water

Comparatively poorer performers

- Thames Water
- Southern Water
- South East Water
- Cambridge Water

Complaint performance across the industry

This is the first year that we have reported on all complaints that water companies receive, regardless of how they are made.

While this gives us a much clearer picture of the scale of complaints, it does mean that direct comparisons with other years cannot be made. However, as an indication, we found that written complaints rose by 13%. These constituted 45% of all household complaints made to water companies. Telephone complaints made up the largest proportion of complaints at 51%, with the remainder being reported through other channels such as social media, webchat, SMS and in-person visits.

The way in which we measure complaints to CCW has not changed. These increased by 1% to 6,197 complaints, compared to 6,128 in 2021-22. We estimate that the cost to CCW of handling these complaints in 2022-23 was £1,505,198. That means a fifth of CCW's entire organisational budget was spent solely on resolving complaints that companies could not close to the customer's satisfaction. In addition to helping household customers resolve their complaints, we also assist business customers in the same way.

Among water and sewerage companies, two companies stand out as poor performers in relation to the number of complaints that they received. Southern Water and Thames Water reported 4.6 times and 2.6 times more

complaints than the industry median for water and sewerage companies respectively (and 2.8 and 1.6 times the average for water and sewerage companies). For water only companies, South East Water reported 1.6 times more complaints than the median (and average) for water only companies.

The number of complaints that customers across England and Wales had to escalate (stage 2 complaints) within their water company was 15,445. That's 6.6% of all complaints¹. This overall industry percentage was skewed by the performance of Thames Water, where its Stage 2 percentage of 14.6% was 2.6 times higher than that of the next worst performing water and sewerage company.

Overall complaints to CCW remained stable (1% increase) although complaints to us generated by customers of water only companies saw a 66% increase. However, we have seen a significant increase in the complaints to CCW (29%) in the first quarter of 2023-24 which underlines the need for companies to effectively resolve complaints to the customer's satisfaction, without the need for CCW to intervene.

¹ If complaints are not resolved at the initial stage of a company's complaints process (Stage 1), these become escalated complaints within the company (Stage 2).

Main causes of customer complaints

In this section, we assess the main reasons why people needed to make a complaint. Complaints to companies are broken down into three main categories – billing (47% of total), water complaints (30%) and wastewater complaints (22%).

CCW record complaint categories with more granularity than companies report to us. This means that we are able to better understand which issues are giving customers reason to complain. The categories² of complaints to CCW relate to billing (43% of total), water services (22%), administration (14%), wastewater (11%) and other (10%). We found that the majority of complaints to CCW related to billing.

Chart 1: Complaints to companies - breakdown by category

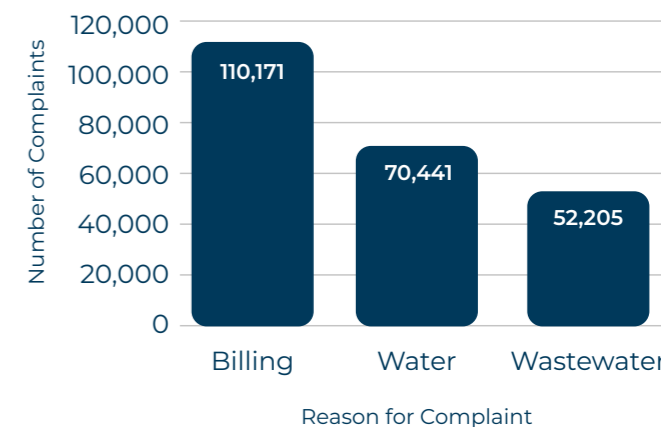
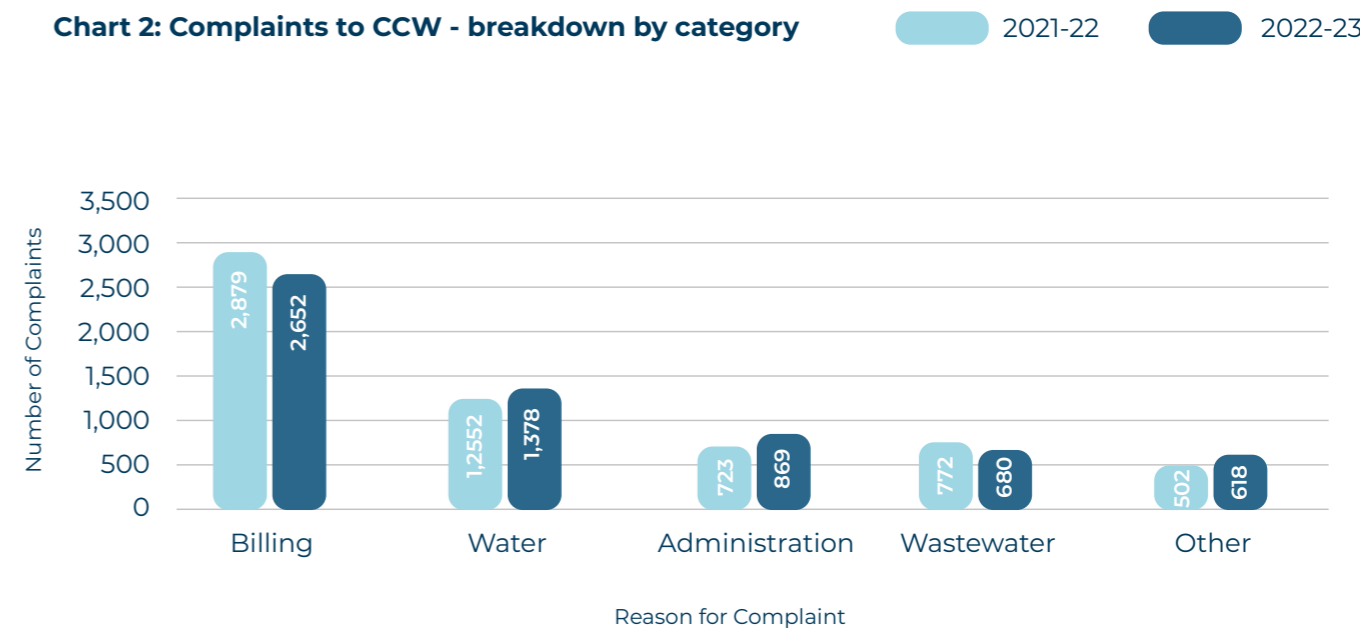


Chart 2: Complaints to CCW - breakdown by category



² The following sections outline the types of complaints that we most commonly see in each of these categories.

Complaints about billing

Billing continues to be the main reason for people to complain. However complaints of this type to CCW fell by 8%, suggesting that companies are maintaining the improvement in resolving billing issues without the need to involve us (as highlighted in our 2022 report³). Given the cost of living crisis, it's now more important than ever for bills to be correct, and we expect companies to continue the good progress to address any issues relating to billing.

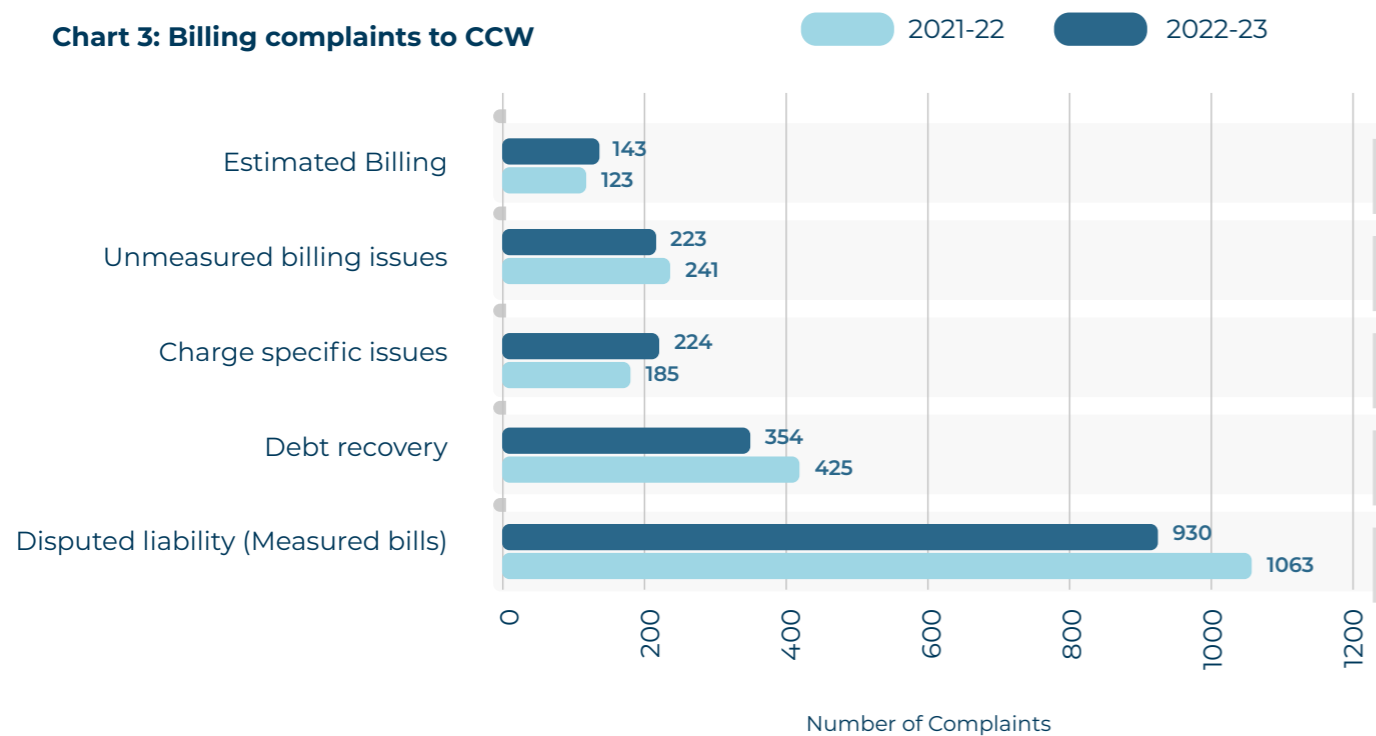
Customers disputing the volume of water (disputed liability complaints) they have used remains the highest category of billing complaint. However complaints of this nature fell by 13% on the previous year – a welcome reduction.

The full impact of the cost of living crisis on complaints is not fully understood, but our [Water Matters research](#) tells us that more people are finding themselves in financial vulnerability. From the complaints that CCW received, those relating to charges,

have seen a 21% increase. Estimated billing complaints increased by 16%. However there was a 17% fall in complaints about debt recovery. Water companies have recognised that there is potential for customers to face particular financial stress in the current economic environment. They've responded by continuing to adopt recommendations from [our independent review of water affordability](#), published in May 2021. For instance, using more prominent messaging about support on bills and envelopes and providing greater flexibility on payment frequencies and amounts. Companies have also needed to take into account [Ofwat's 'Paying Fair' guidelines](#), published in May 2022, on dealing with customers in debt.

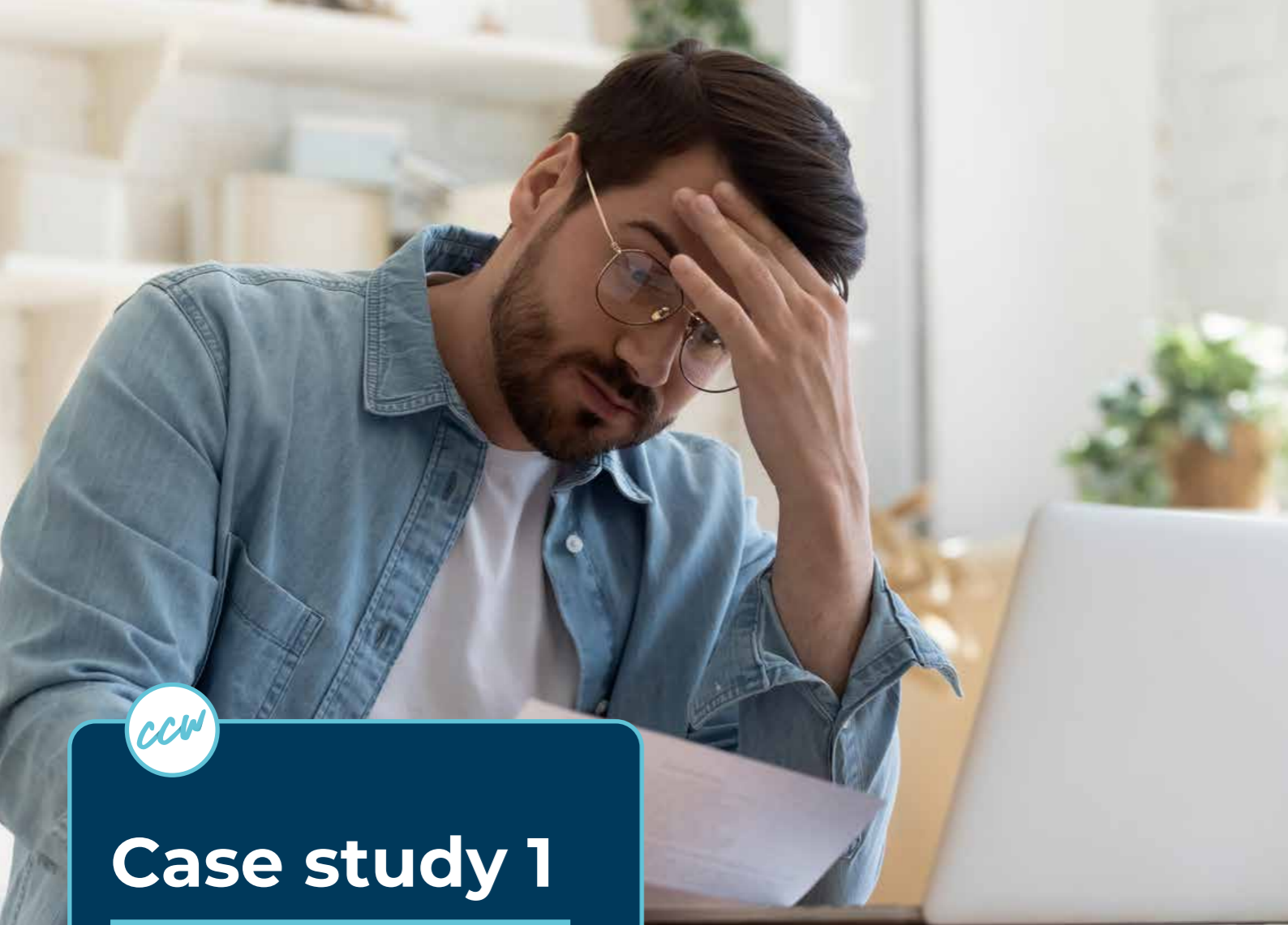
Alongside this, CCW collaborated with Water UK on the Support on Tap campaign to raise awareness of the help available. All these measures should help people find the support they need to avoid falling behind with water charges or facing recovery action.

Chart 3: Billing complaints to CCW



³ Billing and charging complaints to CCW fell by 15% in 2021-22





Case study 1

Graham did not agree with his water meter reading and believed that his company was overcharging him for at least two years. He had tried to raise a number of complaints with his company but had not heard anything back. When the customer came to CCW he told us that his company were only willing to offer £20 as a gesture of goodwill. The customer was very distressed by this and worried about how they would pay such a large bill. After we reviewed Graham's complaint, we convinced the company to do further investigations into the customer's consumption. It found that there was a leak on the supply pipe which the customer fixed. The company reassessed his charges and provided a leakage allowance of £1,527.93, as well as £517 as a gesture of goodwill for its poor service. The customer was very happy with the resolution that CCW provided.

Complaints about water services

Complaints about water services formed the next largest category of complaints for both WaSCs and WOCs. They accounted for 30% of all complaints made to companies in 2022-23.

The summer of 2022 was particularly hot and dry with six water companies having hosepipe bans in place in parts of their regions. There were also extreme heatwaves during this time, including record-breaking temperatures across England and Wales. This led to localised supply issues where companies could not keep up with the demand for water, resulting in low pressure and loss of supply for some customers.

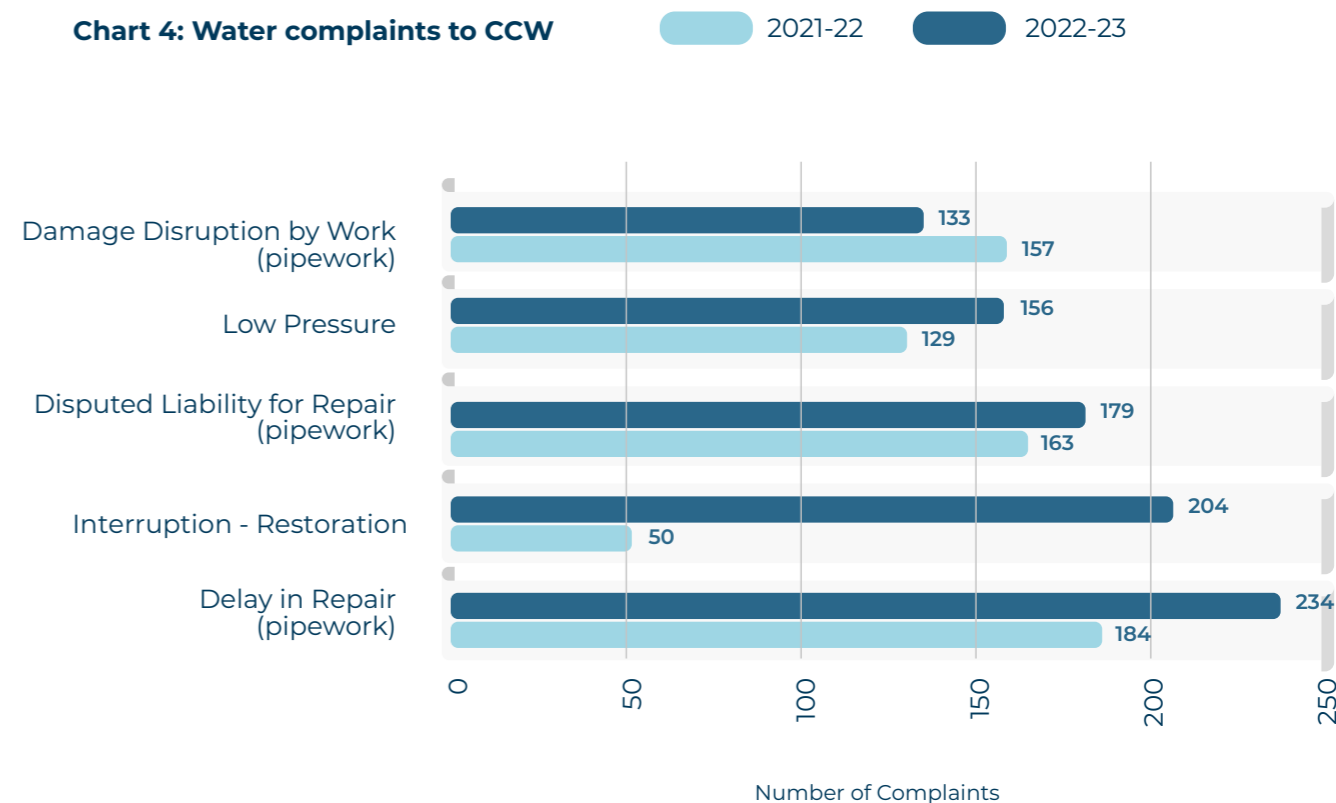
Complaints about water services almost doubled in the summer months and remained high throughout the autumn as hosepipe restrictions remained in place.

Water complaints to CCW

Complaints to CCW about water services increased by 10%. Delays in repairs and customers disputing who was responsible for fixing pipework remained in the top three categories of complaint, increasing by 27% and 10% respectively. The impact of supply issues was also clearly seen. Complaints relating to restoring a water supply after an interruption increased three-fold to become the second highest reason for water related complaints to CCW. Other supply related complaints such as low pressure, notice of interruptions and supply restrictions increased significantly over the year.



Chart 4: Water complaints to CCW



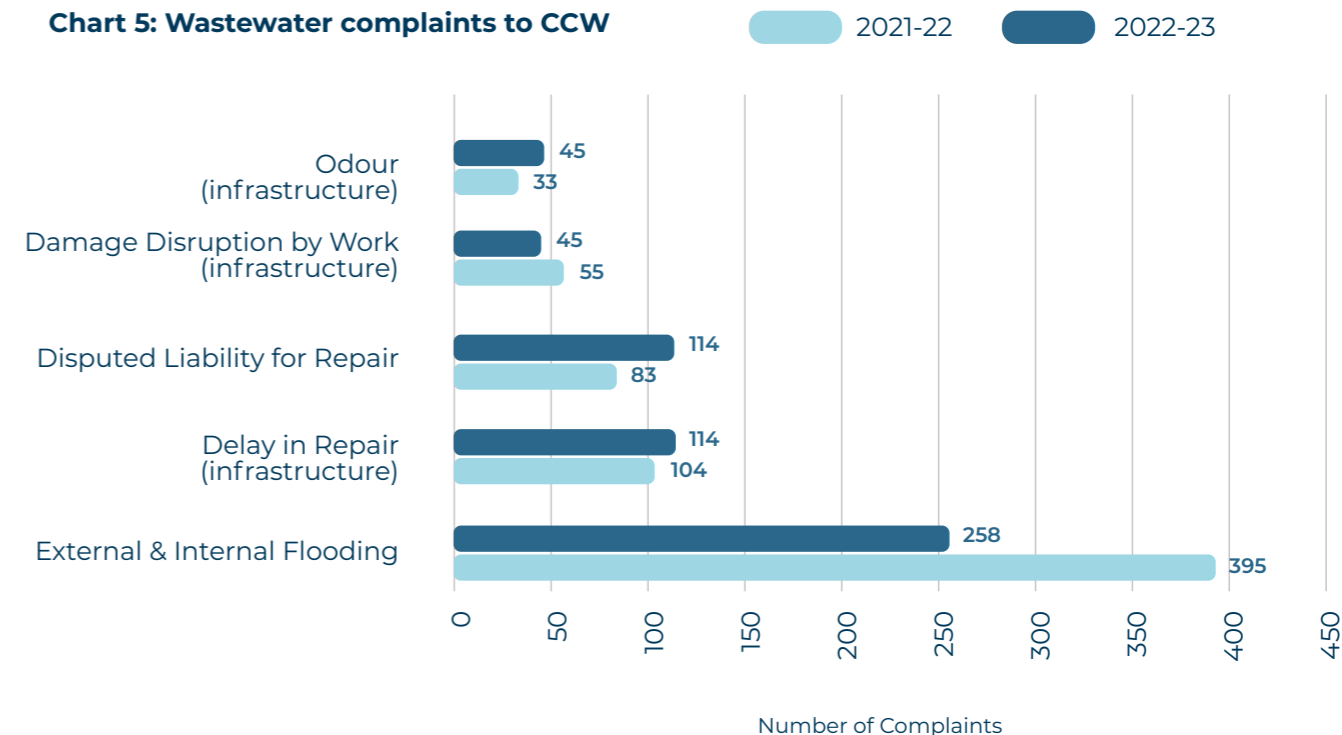
Case study 2

Monica contacted us as she had contaminated water. Her water company immediately installed an overground water supply to provide fresh water but as it was December there were several interruptions due to frozen water pipes. The customer tried many times to get details from the company on when it would be fixing its network, along with an estimate of how long it would take. Frustrated by the lack of response from the company and that the repairs had still not been made, she came to CCW. We reviewed Monica's contact with the company and the delays in repairs and found that the level of service from the company had fallen far short of what we would expect. We advised the company to provide the customer with a detailed timeline of works and expected completion dates, as well as a gesture of goodwill. The company agreed to pay Monica's water and sewerage charges, totaling around £400, until the repairs were complete. Monica was happy with the outcome and thanked CCW for our help and support.

Complaints about wastewater services

Complaints about wastewater services accounted for 22% of all those made to water and sewerage companies. Increased public awareness about environmental issues, such as sewage discharges, continued to play a significant role in wastewater complaints although - as highlighted in last year's report - these are less likely to be escalated to CCW. In fact, wastewater complaints to CCW fell by 12%, the second year in succession there has been a decrease in this category.

Chart 5: Wastewater complaints to CCW



In last year's report, external and internal sewer flooding made up more than half of all wastewater complaints to CCW. Although these still form the largest group of complaints we see relating to wastewater, these fell by a third in 2022-23. They made up 38% of all wastewater complaints. However, this decrease should be considered alongside the fact that far drier weather conditions resulted in less incidents of sewer flooding during the year. Among the top categories of complaint, disputes about the liability for repairs rose by 37% and delays to repairs increased by 10%. We also saw a 36% rise in complaints about odour.

Our End Sewer Flooding Misery campaign, which was supported by Ofwat, aimed to help people who had

experienced the issue of being flooded by sewage, either in their gardens or inside their homes. We particularly wanted to support those who had been affected more than once and were afraid of it happening again.

We are happy to say that sewerage companies have taken positive steps to improve the service they provide to customers and have taken on board our recommendations. Together, we have made positive progress by sharing good ideas and agreeing what needs to change including improvements to support, clean up, response times and compensation. We hope to see these changes reduce flooding complaints to both companies and CCW next year.

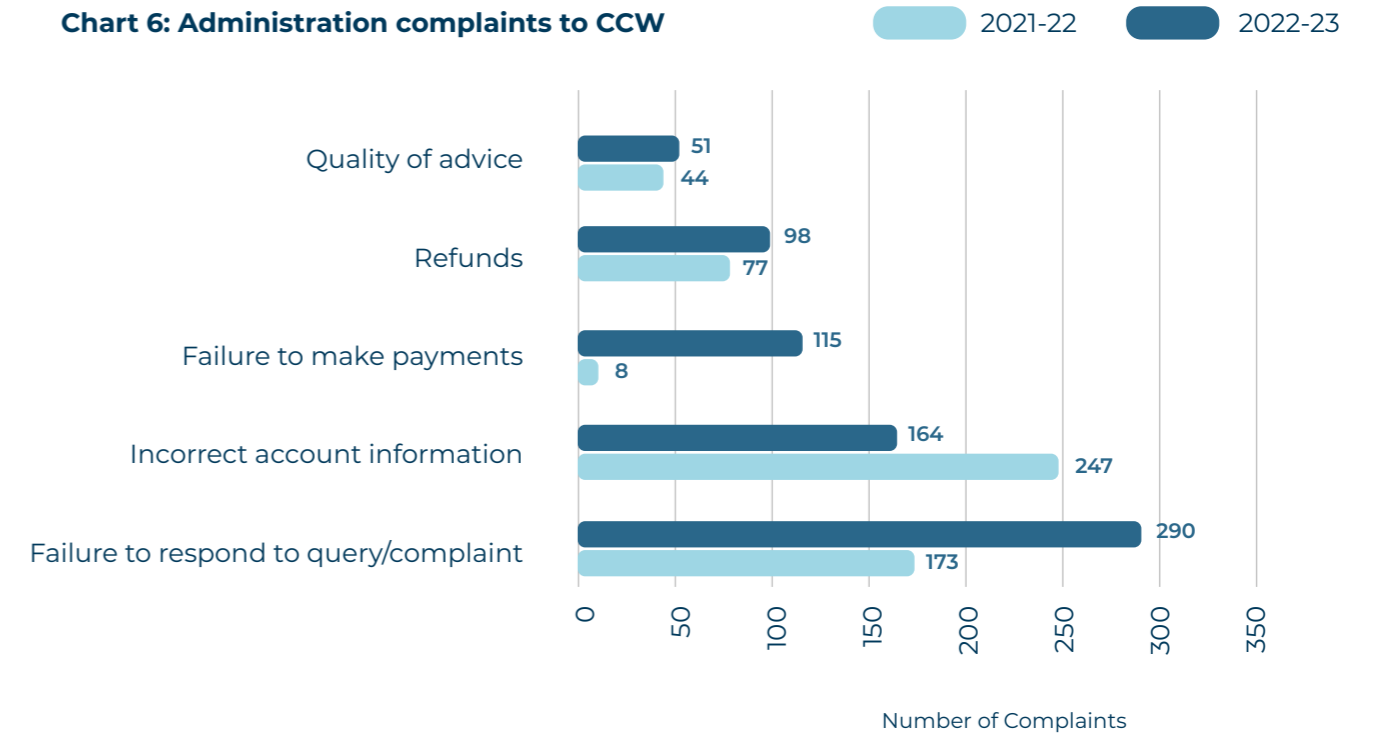


Case study 3

In February 2022, Bal's garden was flooded with sewage. The cause was identified as a failure in the company's anti-flood device that was installed in 2013 and was supposed to be maintained every six months. Following the flooding the customer paid for the cost of the clean up and sanitizing the area and tried over several months to get the company to pay these expenses and explain why the flooding occurred in the first place. Unhappy with the lack of response from the company,

Bal approached CCW. As we gathered more information, it came to light that the company had not been inspecting its asset. It had also not added it to its list for regular maintenance. These longstanding service failures led us to begin a formal investigation against the company. After further mediation and challenges from CCW, the company agreed to provide compensation of £7,500. Bal was very happy with the outcome and our help in finally resolving their issue.

Chart 6: Administration complaints to CCW



Administration complaints

Complaints brought to CCW by customers relating to administration rose by 20% in 2022-23. This is largely due to significant increases in companies failing to respond to queries (+68%) and a thirteen-fold increase in failures to make either goodwill or compensation payments. The three companies with the largest increases in administration complaints were accountable for 76% of the overall increase - Affinity Water (+373%), South East Water (+333%) and Anglian Water (+190%). The increases for these companies were largely due to customers complaining about not receiving compensation payments after water outages, and failures to respond to customers' complaints/queries, missing appointments or incorrect account information leading to incorrect billing.



Company performance in focus

We examine the performance of individual water companies by comparing them with others that provide the same main services.

Our comparison takes into account two distinct metrics for performance – the total complaints received by companies from customers and our complaint-handling metric⁴.

This section provides additional commentary on the performance of companies that demonstrated better or worse than average performance in both metrics. It is possible for companies to have high levels of complaints, whilst being good at handling them.

Water and sewerage companies – WaSCs

Table 1 shows the performance of each WaSC in terms of the complaints they received in 2022-23 and our complaint-handling metric. The median number of complaints per 10,000 connections for WaSCs was 49.88.

Table 1: Complaint performance 2022-23 – WaSCs

Company	Total complaints per 10,000 connections	Complaint handling	
Anglian Water	42.93	Worse than average	Good
Dŵr Cymru Welsh Water	49.88	Worse than average	Better than average
Hafren Dyfrdwy	29.91	Better than average	Worse than average
Northumbrian Water	36.51	Better than average	Worse than average
Severn Trent Water	31.85	Poor	Poor
South West Water	76.10	Worse than average	
Southern Water	227.52	Worse than average	
Thames Water	127.72	Poor	
United Utilities	51.03	Better than average	
Wessex Water	21.57	Better than average	
Yorkshire Water	102.81	Better than average	

⁴ The complaint-handling metric provides a more holistic picture of how well companies are dealing with complaints. It uses the information we hold on complaints that are not resolved to the customer's satisfaction by companies and those that customers bring to CCW for resolution. Individual complaint-handling calculations for companies are shown in Appendix 1b.



Better performers

No company achieved good performance in complaint handling.

Wessex Water and Hafren Dyfrdwy were the only water and sewerage companies to achieve good performance in total complaints and better than average performance in complaint handling. Wessex Water has consistently held a sustained lead in this area and it is encouraging that Hafren Dyfrdwy has moved from “worse than average” last year to “better than average” this year for complaint handling. We look forward to seeing this improvement continue.



Poor performing companies

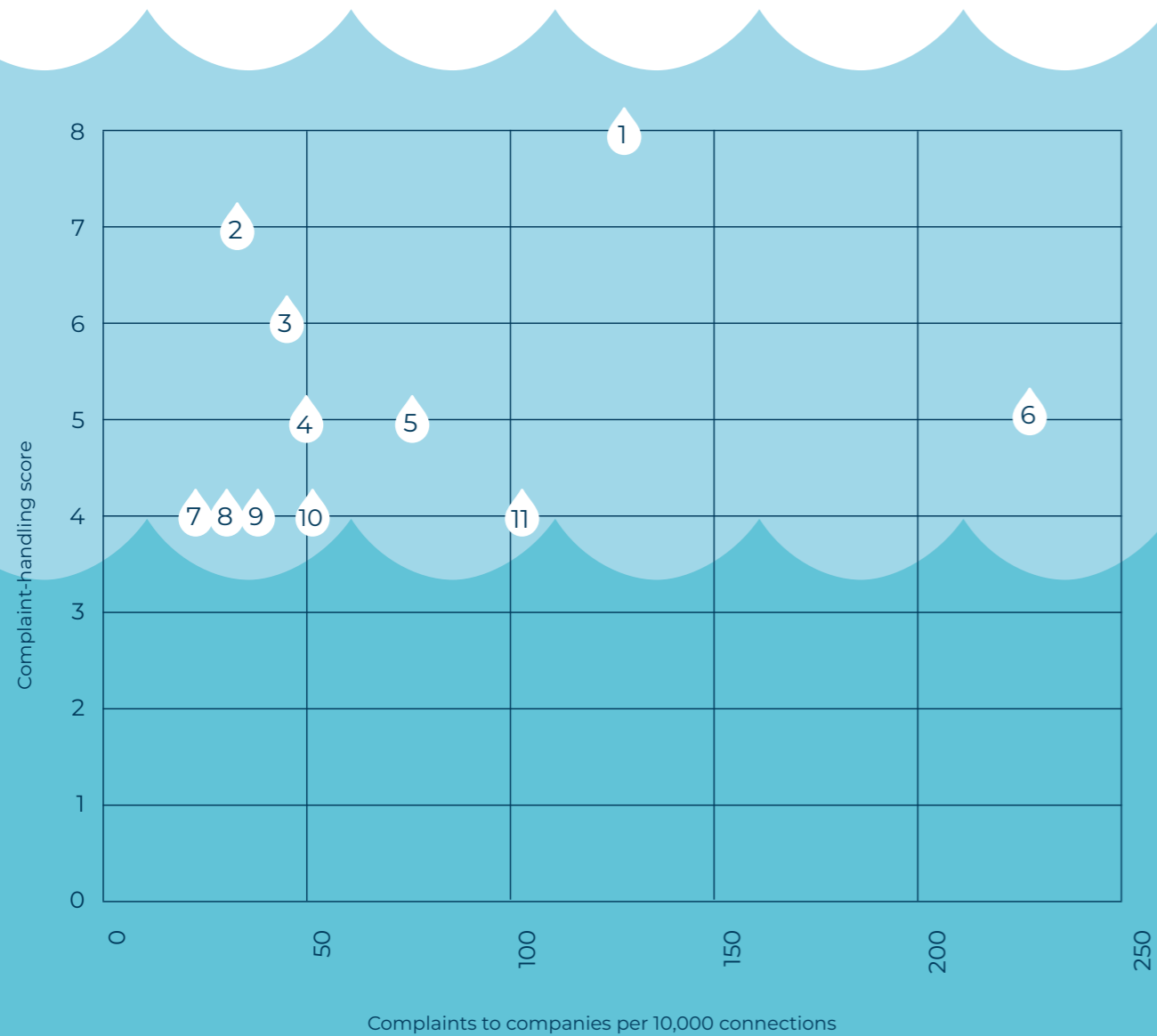
Thames Water is the only water and sewerage company that demonstrated poor performance in both metrics. Billing complaints are the highest in the industry and Stage 2 complaints are particularly high, 2.6 times the level of the next worst performing water and sewerage company in this metric. Our insight shows that Thames Water receives high volumes of complaints in all categories, and the volume of stage 2 suggests they are not always handled well. Delays in responding led to customers contacting Thames Water again to chase up their issue, exacerbating the high complaint volumes and general unhappiness with its customer service.

Thames Water has set out its action plan to turn around its performance, and has also worked with CCW to try to resolve its problems. Whilst the company is showing a positive trend in the first half of 2023-24 for first stage complaints, discouragingly the progress to date has not delivered the step change needed for escalated complaints or those referred to CCW. A robust plan placing greater emphasis on handling and resolving complaints should be a priority for Thames Water and must form part of its wider turnaround plan.

Southern Water's complaints per 10,000 connections provide serious cause for concern, being 1.8 times higher than Thames Water. It received very high volumes of wastewater, water and billing complaints when compared to other WASCs. Complaint handling is rated as worse than average with high levels of complaints to CCW. Although the level of Stage 2 complaints appears low, this is primarily because of the very large number of Stage 1 complaints – meaning escalated complaints as a proportion of this seem low. It highlights the fact that customers in the region are more likely to experience problems with their service, and need to complain to the company about the issues that they are facing.

We want to see a clear plan and compelling evidence that the company is committed and able to turnaround its complaints performance through making the necessary changes. To date, we have been unimpressed by Southern Water's apparent lack of understanding of what drives customers to complain in the first place, and therefore its ability to address these root causes.

Chart 7: Total complaints to companies per 10,000 connections vs CCW complaint-handling metric⁵ - WaSCs



- Complaints to companies per 10,000 connections
- 1. Thames Water
 - 2. Severn Trent
 - 3. Anglian Water
 - 4. Dwr Cymru Welsh Water
 - 5. South West Water
 - 6. Southern Water
 - 7. Wessex Water
 - 8. Hafren Dyfrdwy
 - 9. Northumbrian Water
 - 10. United Utilities
 - 11. Yorkshire Water

Water only companies - WOCs

Table 2 shows the performance of each WOC in terms of complaints received from its customers and complaint handling. The median number of complaints per 10,000 connections for WOCs is 35.10.

Table 2: Complaint performance 2022-23 – WOCs

Company	Total complaints per 10,000 connections	Complaint handling	
Affinity Water	30.49	Better than average	Better than average
Bristol Water	23.94	Better than average	Better than average
Cambridge Water	39.72	Poor	Worse than average
Essex & Suffolk Water	41.03	Better than average	Better than average
Portsmouth Water	22.62	Better than average	Better than average
SES Water	41.02	Worse than average	Worse than average
South East Water	57.19	Poor	Poor
South Staffs Water	27.68	Better than average	Better than average



Better performers

There were no WOCs that achieved good performance in complaint handling.

Both Bristol Water and Portsmouth Water were rated good in total complaints and better than average in complaint handling. Bristol Water has maintained this performance level from last year, which in itself is very positive. Portsmouth Water had good total complaint levels last year but a worse than average complaint-handling score. We are pleased to see the improvement it has made this year and look forward to seeing it sustained and improved in 2023-24.



⁵ See appendix 1a for details of how the complaints metric is calculated. A lower score shows better performance.

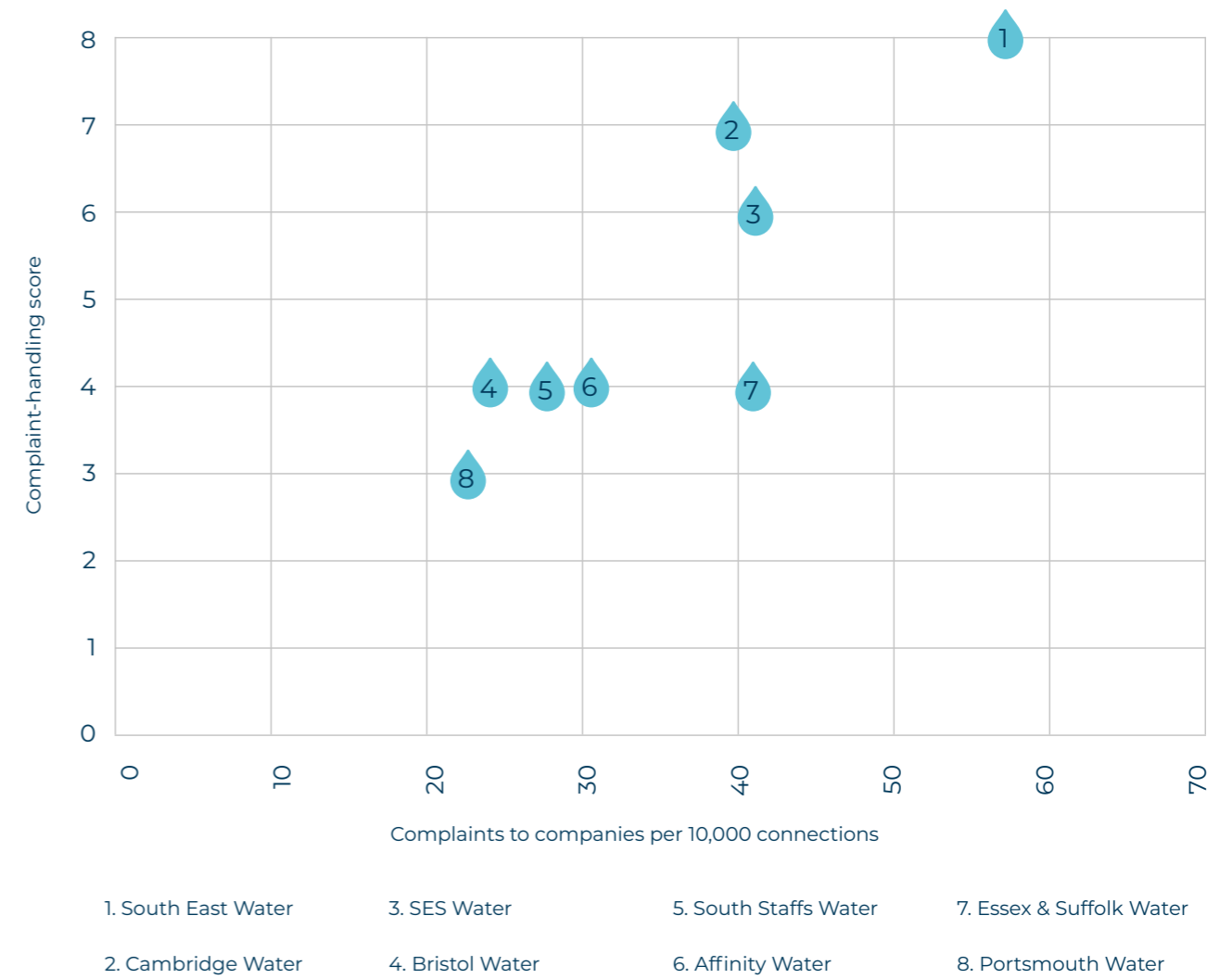


Poorer performing companies

South East Water was the poorest performing WOC, rating poor on both metrics. The company has explained that this was driven by operational incidents. South East Water experienced lengthy water supply outages in its region across the year, which naturally led to its customers complaining. As well as complaints about the water outage in December 2022, the manner in which the company compensated customers led to a second wave of complaints. We have talked with the company about lessons to learn from its handling of incidents across the year and we look forward to seeing improvements, as well as fewer incidents, in 2023-24.

Cambridge Water and South Staffs Water generated more than three times the number of complaints to CCW, compared to 2021-22. This was largely because of a significant data breach that has been widely reported across the industry. However, despite being part of the same company and being served by a single call centre, South Staffs Water maintained its 'better than average' rating for complaint handling. Cambridge Water, by comparison, was rated 'poor'. We will push the management of both companies to ensure that the outcome of complaint handling in both areas meets and exceeds the expectations of its customers in both supply areas.

Chart 8: Total complaints per 10,000 connections vs CCW complaint-handling metric⁶ – WOCs



⁶ See appendix 1a for details of how the complaints metric is calculated. A lower score shows better performance.



Conclusion

Last year, we made clear our intention to report on complaints across all forms of communication and not just those made it writing.

While this gives us a more complete picture across the industry, it does mean that direct comparisons to previous years can only be made on the complaints that CCW received.

In last year's report we called out Thames Water and Southern Water for both the high levels of complaints and their performance in handling them. We are extremely disappointed and concerned that the latest data paints a similarly poor picture for both companies. Both are outliers for the number of complaints they received from customers, with Southern Water receiving significantly more (when normalised⁷) than any other WaSC. Furthermore, neither company can point to a single issue affecting overall complaint levels, with both performing poorly across all categories (billing, water and wastewater).

The high levels of complaints continues to have an impact on both companies' ability to handle them effectively. Stage 2 complaints at Thames Water are 2.6 times the level of any other water and sewerage company. Southern Water had a lower percentage of stage two complaints compared to Thames Water, but still performed worse than average. Performance for these companies has been consistently poor for some time now and customers deserve better.

In our last annual household complaints report, we also highlighted the poor complaint-handling performance of South East Water. It is therefore disappointing that we again have to shine a light on its performance for all of the wrong reasons. It had significantly higher levels of complaints than other WOCs, resulting in more complaints coming through to CCW than in 2021-22.

The way complaints are handled represents an opportunity for companies to strengthen relationships with their customers and in turn build trust. However poor performing companies are wasting this opportunity. We want to see significant and sustained investment from the poor performers in customer service and

Leadership and Boards which show a demonstrable commitment to investing in their front line teams.

We are working with companies to improve their culture, ensuring that customers are at the heart everything that they do. This includes giving more autonomy to call centre staff, so that they are able to make the right decisions for customers when dealing with any type of complaint or contact. More details on the wider work that we are doing with companies to focus the industry on a customer-centric culture can be found **in our Customer Centric Culture report**.

While overall complaint levels to CCW remained stable (1% increase), over half of all water companies generated more complaints to CCW than the previous year. There has been a significant rise (29%) in the number of complaints received by CCW in the first quarter of 2023-24. Billing remains the main driver for these complaints and these are well within the gift of companies to resolve without the need for escalation.

In broader terms, environmental factors have played a part in both complaints to companies and those brought to CCW. Water complaints rose significantly over the hot summer period in 2022 and remained high as restrictions stayed in place. Some companies managed the spike in complaints better than others, as reflected in the differing complaint rates for the year. Conversely, wastewater complaints fell due to fewer instances of extreme wet weather and flooding incidents through the winter months when these issues generally rise. Companies need to learn from this to ensure they are meeting the challenges of climate change, especially as extreme weather is likely to become more common.

Finally, CCW has urged companies to take an empathetic, person-centered approach to debt during the cost of living crisis. It is encouraging that companies appear to have heeded our advice and debt recovery complaints did not rise during the year.

⁷ See Appendix 1A, Our Methodology

Next steps

This year we have reset the baseline for future reports and we want to see improvements throughout the industry. Most notably, those companies that are continuing to perform at the bottom rung of the ladder need to take ownership of the problems and make meaningful change.

We are committed to working with companies to determine how they can reduce their complaints and improve the experience for customers in resolving their concerns. We have an ongoing dialogue with all companies about their performance in relation to complaints, through our regional liaison and consumer relations teams.

We are also reviewing our approach to complaints and debt assessments. We want to increase our focus on sharing best practice and understanding where the customer journey can be improved. We are committed to holding companies to account where their complaint handling is not at the level that we, or customers, expect. We intend to visit every company at least once every three years, although we will focus on those where we feel that improvements need to be made as a priority for customers in the first instance. We'll also prioritise visiting better performing companies where we may be able to highlight good practice to the rest of the industry. We will share more information with companies about our plans for the assessments through the complaints forum and intend to pilot our new approach in November.

There is an opportunity for Ofwat's measure of customer satisfaction (C-MeX) to be widened to place more emphasis on complaints. High volumes of complaints are a strong indicator of poor customer service or more fundamental problems. That's why we are pushing for 25% of the value of C-MeX based on a measure of the volume of complaints that a company receives. We believe that this

direct incentive would encourage companies to reduce the number of complaints that they receive.

We are also working with Ofwat on the **customer facing licence condition**, which aims to transform water company performance for customers. The condition is based on a number of principles including: that appropriate support is given when things go wrong and the company helps to put things right; and that companies learn from past experiences and demonstrate continual improvement to prevent foreseeable customer harm. We will be pressing Ofwat to use complaints metrics as a tool to monitor whether companies are adhering to these principles.

Finally, if a complaint can't be resolved directly with the water company, and if CCW is unable to mediate a satisfactory resolution, customers have the right to have their complaint reviewed by an independent adjudicator. This final complaint

stage - called Alternative Dispute Resolution (ADR) - must be part of a seamless and efficient consumer journey. We have committed to revamping our approach to ADR. In a move designed to simplify the process for our consumers and expedite resolution times, we will be bringing the ADR process in-house. Starting from December 2023, we will be offering a mediation and adjudication service as part of our core offerings. This strategic change aims to offer a more straightforward, convenient channel for resolving complaints. It also marks an important step in our ongoing efforts to provide the highest level of service to every person that turns to us for help, as well as providing us with more insight on the end-to-end process which we can use to help us identify positive changes within the industry.

Appendix 1a: Our methodology

Normalising complaints

To allow us to compare companies of different sizes, our complaint metrics factor in the number of water and wastewater connections served by each company. The metric we use to do this is 'complaints per 10,000 connections'. For example:

Company A

Total complaints	600
Total connections	4,000,000
Total complaints per 10,000 connections	= 600/4,000,000 x 10,000 = 1.5

Comparative Performance

Where we compare the performance of individual companies we do so within their respective segments as either Water and Sewerage Companies (WaSCs) or Water Only Companies (WOCs).

Our metrics

We assess company complaint performance based upon two metrics designed to reflect the underlying service provided to customers and the ability of companies to resolve customer complaints first time.

Volume of complaints

We use total complaints (per 10,000 connections) to reflect the underpinning service.

This is assessed based on quartiles where quartile 1 is the best performing quartile. The colour coding is as follows:

Table A1

Quartile	Total complaint rank
1	Good
2	Above average
3	Below average
4	Poor

Complaint-handling score

The complaint-handling metric is a composite of the percentage of escalated Stage 2 complaints (compared to total complaints) received by companies and complaints made about companies to CCW per 10,000 connections. Both components are based on the quartile performance within WaSC and WOC bandings where Quartile 1 is the best performing quartile. Each quartile is then scored as follows.

Quartile 1: 1

Quartile 2: 2

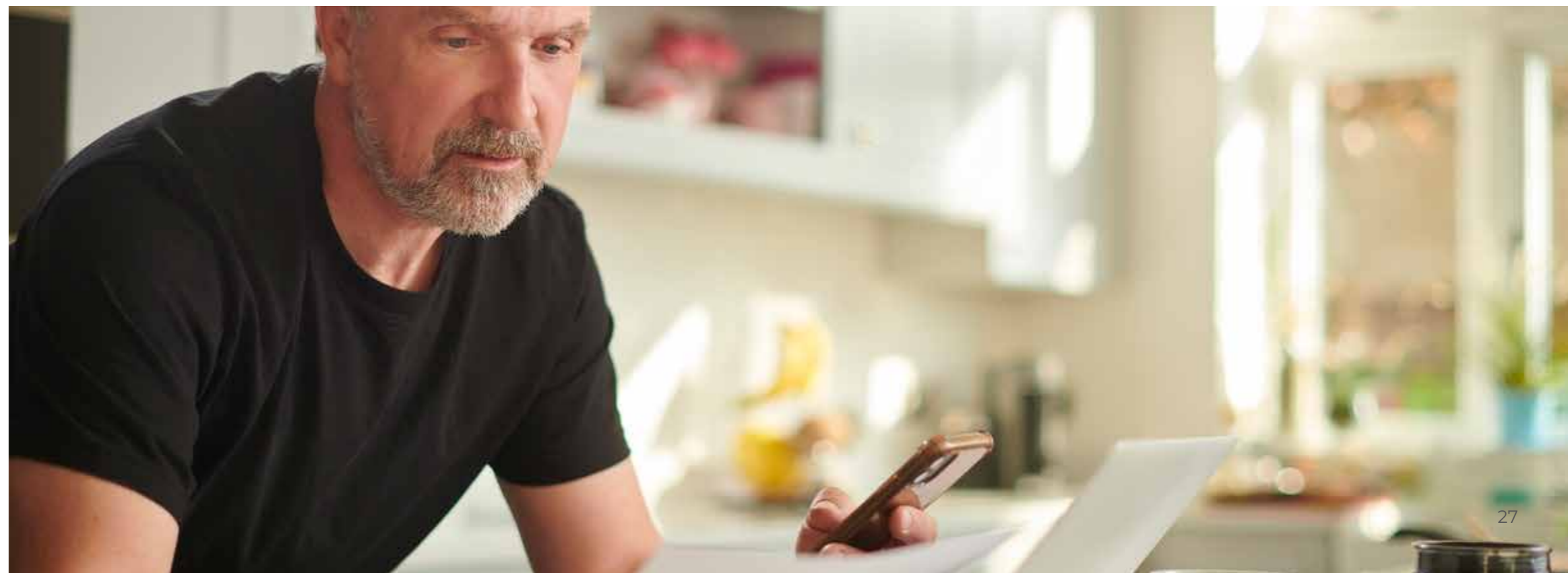
Quartile 3: 3

Quartile 4: 4

The respective scores for Stage 2 complaints and Complaints made about companies to CCW for each company are then added together to determine their respective complaint-handling score. Each company is then assigned an overall complaint-handling ranking in accordance with the following criteria:

Table A2

Total score	Complaint-handling rank
2	Good
3-4	Above average
5-6	Below average
7-8	Poor



ccw

The voice for water consumers
Llais defnyddwyr dŵr



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